

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
KATHERINE A. TANAKA
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Katherine.Tanaka@fd.org

Attorney for Michael Gerald Hammond

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

MICHAEL GERALD HAMMOND,

Defendant.

Case No. 2:18-cr-00059-KJD-DJA

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Katherine A. Tanaka, Assistant Federal Public Defender, counsel for Michael Gerald Hammond, that the Preliminary Hearing currently scheduled on September 15, 2023, be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. The parties are in the process of discussing a resolution. Defense counsel needs additional time to review discovery with Mr. Hammond and discuss the proposed resolution. Defense counsel needs additional time to discuss Mr. Hammond's options with him so that he can decide whether to waive or go forward with the preliminary hearing.

1 3. Defendant is incarcerated and does not object to a continuance.

2 4. Additionally, denial of this request for continuance could result in a

3 miscarriage of justice.

4 This is the fourth request for continuance filed herein.

5 DATED this 11th day of September, 2023.

6
7 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

9
10 By /s/ Katherine A. Tanaka
KATHERINE A. TANAKA
Assistant Federal Public Defender

By /s/ Justin Washburne
JUSTIN WASHBURN
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MICHAEL GERALD HAMMOND
Defendant.

Case No. 2:18-cr-00059-KJD-DJA

ORDER

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
September 15, 2023 at the hour of 3:00 p.m., be vacated and continued to Friday, November 3,
2023 at the hour of 1:00 p.m.

DATED: 9/12/2023.

UNITED STATES MAGISTRATE JUDGE